Date: June 27, 2023

Dear County Directors of Social Services

Attention: Food and Nutrition Services (FNS) Income Maintenance Caseworkers, Managers and Supervisors

Subject: Temporary Administrative Waivers to Support Unwinding from the COVID-19 Public Health Emergency (PHE)

Priority: Information and Action

I. GENERAL INFORMATION

To further support county departments of social services (DSS) agencies and Food and Nutrition Services (FNS) applicants/recipient, the North Carolina Department of Health and Human Services (NCDHHS) requested approval to continue offering two temporary administrative waivers to support unwinding from the COVID-19 Public Health Emergency (PHE). The United States Department of Agriculture (USDA) approved the continuance of the following waivers:

1. Waiving the certification interview for 11 months, beginning July 1, 2023 and ending May 31, 2024.

Some interviews may be waived at initial application or recertification, providing that the applicant’s identity has been verified and all other mandatory verifications in 7 CFR 273.2(f)(1) have been completed. Caseworkers must contact the household if any information on the application or recertification is questionable, or if verification is incomplete.

FNS interviews are an essential step for determining eligibility for the program. Interviews are an opportunity for DSS agencies to ensure the forms are completed, clarify information reported on applications or recertification forms, collect verification documents, and answer client questions. Therefore, some applicants/recipients who submit their application and recertification form will need an interview.
As you are aware, NCDHHS has required interviews for 50% of cases, starting January 1, 2022. Refer to DCDL, FNS Recertification Period Extension (Revised) - Information and Action for more information.

2. **Allowing alternative methods for recording telephonic signatures** for 12 months, beginning July 1, 2023 and ending on June 30, 2024. This waiver allows for recording telephonic signatures through means other than creating an audio recording of the client’s verbal attestation as required by 7 CFR 273.2(c)(7)(viii).

II. **POLICY PROCEDURE**

A. **Waiving interviews for applications and recertification:**

The approved waiver to waive the certification interviews applies to applications and recertifications:

Refer to policy instructions in FNS 420 Normal Application Processing and FNS 510 SR Recertifications Procedures to complete applications and recertifications based on timeliness of receipt.

1. Applicants who submit an application whose last digit of their social security number is an even number, may **not** require an interview. Under certain circumstances, caseworkers will need to conduct an interview for applications whose last digit of the social security number is even, if:
   i. The application form is not complete
   ii. Information is questionable or
   iii. Mandatory verification is incomplete

2. Recipients who submit the DSS-2435R (interview not required) whose last digit of their Case Identifier number which is the Product Delivery Case (PDC) (see example below) ends with an even number, **may not** require an interview. Under certain circumstances, caseworkers will need to conduct an interview for recertifications whose last digit of the Case Identifier number is even, if:
   i. The recertification form is not complete
   ii. Information is questionable or
   iii. Mandatory verification is incomplete

While these cases may not be required to complete an interview, if the worker has contact with the household for other reasons, an interview may be completed at that time. Code in NC FAST to indicate an interview is not required at the end of the next certification period.
B. Interviews MUST be completed for the following applications and/or recertifications:

Refer to policy instructions in **FNS 415 Interviewing**, **FNS 420 Normal Application Processing**, and **FNS 505.07 Recertification Interviews**.

1. All applicants who submit an application whose last digit of the social security number is an **odd** number, MUST be interviewed.

2. Recipients who submit the DSS-2435I (interview required) for six-month recertifications and the Case Identifier number which is the Product Delivery Case (PDC) (see example below) ends with an **odd** number, MUST have an interview completed.
C. Allowing alternative methods for recording telephonic signatures:

Allows for recording telephonic signatures through means other than creating an audio recording of the client’s verbal attestation as required by 7 CFR 273.2(c)(7)(viii).

Caseworkers must document the verbal attestation in NC FAST and provide the client a written copy of the completed application, with instructions for correcting errors or omissions. Refer to Dear County Director Letter EFS-FNSEP-44-2021 for complete guidance (https://files.nc.gov/ncdhhs/documents/files/dss/dcdl/economicservices/EFS-FNSEP-44-2021.pdf).

III. IMPLEMENTATION INSTRUCTIONS

This policy is effective July 1, 2023. If you have any questions, please submit them to the Continuous Quality Improvement Team (CQI) dss.policy.questions@dhhs.nc.gov.

Sincerely,

Madhu Vulimiri, MPP
Deputy Director
Division of Child and Family Well-Being

MV/vb

EFS-FNSEP-21-2023